

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

KRISTINE R. REDNOUR)	
)	
Plaintiff,)	
)	
vs.)	Cause No. 1:13-CV-0320-SEB-DKL
)	
WAYNE TOWNSHIP FIRE DEPT.;)	
WAYNE TOWNSHIP,)	
)	
Defendants.)	

PLAINTIFF'S PRELIMINARY WITNESS AND EXHIBIT LISTS

Plaintiff Kristine R. Rednour, by counsel, for her Preliminary Witness and Exhibit Lists,
states as follows:

Preliminary Witness List

1. Kristine R. Rednour;
2. Jeff Rednour;
3. Deputy Chief Rick Scott;
4. Lieutenant Felicity Morgan;
5. Dr. Steven Moffatt;
6. Chief of Emergency Medical Services Justin Sparks;
7. Deputy Chief of Operations Matt Stewart;
8. Division Chief of Training and Safety Pedro Caceres;
9. Fire Chief Gene Konzen;
10. Don Hostettler;
11. Tim Bishop;
12. Michael Phillips;
13. Josh Drabick;

14. Jamison Barry;
15. Lieutenant Rob McKain;
16. Jillian McWhirter;
17. Deputy Chief John Garino;
18. Lieutenant Michael J. Diehl;
19. Dr. Samuel Wentworth;
20. Melissa Totleben;
21. Rachel Thomas;
22. Any and all witnesses named by the Defendants;
23. Any and all witnesses identified during the course of these proceedings;
24. Any and all persons named in any expert report or disclosure;
25. Any and all persons needed to authenticate any documents;
26. Any and all persons needed to prove damages;
27. Any and all persons identified in any discovery or documents produced in this matter;
28. Any person, whether designated or not, for the purpose of providing rebuttal evidence; and
29. All persons deposed prior to trial.

As discovery is on-going, Plaintiff reserves the right to amend, modify and/or add to this witness list.

Preliminary Exhibit List

1. Personnel files for Plaintiff and other former and current employees of Defendants;
2. All documents related to Ms. Rednour's leave imposed by Defendants;
3. Any and all documents relating to Plaintiff's termination from Defendants;
4. Any and all documents relating to Plaintiff's efforts to find other employment;

5. Job description of all positions held by Plaintiff at Wayne Township Fire Department;
6. Any and all documents relating to Plaintiff's employment benefits, including health insurance coverage, while she was employed at Wayne Township Fire Department;
7. All documents related to Ms. Rednour's medical bills and records;
8. All documents related to Ms. Rednour's evaluation by Dr. Moffatt;
9. All documents related to Ms. Rednour's evaluations and treatment by Dr. Wentworth;
10. Any and all documents contained in Plaintiff's file with the U.S. Equal Employment Opportunity Commission;
11. Any and all pleadings in this action;
12. Any and all discovery responses in this action;
13. Any and all documents necessary to prove damages;
14. Any and all depositions, including exhibits, taken in this action;
15. Any and all documents produced in response to discovery;
16. Any and all documents listed on Defendants' preliminary or final exhibit lists;
17. All documents and things which may be used for demonstrative purposes;
18. All documents and things which may be used for the purposes of impeachment or rebuttal of witnesses; and
19. Any other documents or exhibits which may be discovered pursuant to continuing discovery.

As discovery is on-going, Plaintiff reserves the right to amend, modify and/or add to this exhibit list.

Respectfully submitted,

s/ Sandra L. Blevins

Kevin W. Betz, No. 14188-82

Sandra L. Blevins, Atty. No. 19646-49

Courtney E. Campbell, No. 30557-49

Attorneys for Plaintiff Kristine R. Rednour

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ Sandra L. Blevins

Sandra L. Blevins

BETZ + BLEVINS
One Indiana Square, Suite 1660
Indianapolis, Indiana 46204
Office: (317) 687-2222
Fax: (317) 687-2221
E-mail: litigation@betzadvocates.com